

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re: SEARS, ROEBUCK & CO. and	:	
SEARS HOLDINGS CORPORATION,	:	
<i>et al.</i>	:	Case No. 18-23538 (RDD)
Debtor	:	
	:	Chapter 11
	:	

MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

I, Thomas A. Lynam, III, Esquire, request admission, *pro hac vice*, before the Honorable Robert D. Drain, to represent Geoff Hess and Stacie Hess, h/w, in the above-referenced bankruptcy proceeding.¹

I certify that I am a member in good standing of the bars in the States of Pennsylvania and New Jersey, the U.S. District Court of New Jersey, the U.S. District Courts for the Eastern and Middle Districts of Pennsylvania, and the United States Third Circuit Court of Appeals.

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: September 30, 2019
Philadelphia, Pennsylvania

VILLARI, LENTZ & LYNAM, LLC

/s/ Thomas A. Lynam, III
THOMAS A. LYNAM, III, ESQUIRE
Attorney ID No. 83817
100 N. 20th Street, Suite 302
Philadelphia, PA 19103
Phone: 215 568-1990 / Fax: 215-568-1920
tlynam@vll-law.com
Attorney for Geoff Hess and Stacie Hess

¹ Undersigned requests admission to represent Geoff and Stacie Hess in their motion for relief from the Automatic Stay in the above bankruptcy proceeding. On July 9, 2019, Geoff and Stacie Hess filed a personal injury action against Sears Holdings Corporation and Sears, Roebuck & Co. (referred to collectively as “Sears”), which after removal is now pending in the District Court for the Eastern District of Pennsylvania (Case No. 5:19-cv-03596). On August 28, 2019, Sears filed a “Notice of Bankruptcy Filing and Imposition of Automatic Stay” in the Eastern District of Pennsylvania, asserting that the tort action is automatically stayed because of Sears’ bankruptcy proceeding pursuant to 11 U.S.C. § 362(a). Mr. and Mrs. Hess thereafter filed a motion for relief from the automatic stay in this Court.

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ORDER GRANTING ADMISSION TO PRACTICE, *PRO HAC VICE*

Upon the motion of Thomas A. Lynam, III, Esquire, to be admitted, *pro hac vice*, to represent Geoff Hess and Stacie Hess, h/w, in the above-referenced bankruptcy proceeding, and upon the movant's certification that he is a member in good standing in the bars in the State of Pennsylvania, the State of New Jersey, the U.S. District Court of New Jersey, the U.S. District Courts for the Eastern and Middle Districts of Pennsylvania, and the United States Third Circuit Court of Appeals, it is hereby

ORDERED, that Thomas A. Lynam, III, Esquire, is admitted to practice, *pro hac vice*, in the above-referenced proceeding to represent Geoff Hess and Stacie Hess in the United States Bankruptcy Court for the Southern District of New York, provided that the filing fee has been submitted.

Dated: October ____, 2019

/s/
UNITED STATES BANKRUPTCY JUDGE

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CERTIFICATE OF SERVICE

I, Thomas A. Lynam, III, Esquire, hereby certify that I am this day serving the foregoing document upon all counsel of record, *via electronic filing*.

VILLARI, LENTZ & LYNAM, LLC

BY: /s/ Thomas A. Lynam,

THOMAS A. LYNAM, III, ESQUIRE

Attorney ID Nos. 83817

100 North 20th Street, Suite 302

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tlynam@vll-law.com

Attorney for Geoff Hess and Stacie Hess

Dated: September 30, 2019